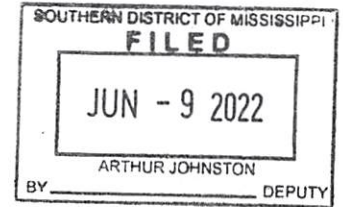


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



TRAVANTI D. WILLIAMS

PLAINTIFF

VS.

CIVIL ACTION NO. 3:22cv313 KHJ-MTP

SANTOS RIVERA AND FLEX
TRANSPORT, INC.

DEFENDANTS

COMPLAINT WITH JURY TRIAL REQUESTED

COMES NOW, Plaintiff Travanti D. Williams (hereinafter "Plaintiff") by and through his attorney(s) of record, and files this Complaint as follows:

1.

Travanti D. Williams is an adult resident citizen of Lawrence County, Mississippi.

2.

Santos Rivera is an adult resident citizen of Stroudsburg, Pennsylvania, and may be served with process at 214 Calhoun Xing, Stroudsburg, Pennsylvania 18360.

3.

Flex Transport, Inc. is a Illinois Profit corporation organized and existing under the laws of the State of Illinois with its principal place of business at 700 Nicholas Blvd., Suite 408, Elk Grove Village, Illinois 60007; is doing business in the State of Mississippi; and may be served by and through service upon its registered agent for service, Srejovic Accounting Services L, 2340 S River Road, Ste. 208 Des Plaines , IL 60018.

4.

This Court has jurisdiction of the parties and the subject matter of this action. Venue is proper as this civil action arises out of negligent acts and omissions committed in Rankin County,

Mississippi and the cause of action alleged in this Complaint occurred and accrued in Rankin County, Mississippi, which is in the United States District Court for the Southern District of Mississippi, Northern Division. Jurisdiction is based on Diversity of Citizenship per 28 U.S.C §1332 in that the lawsuit involves citizens of different States and the amount in controversy exceeds the sum or value of \$75,000.00, exclusive of interests and costs.

5.

On or about January 28, 2021, Travanti D. Williams was operating a vehicle in an easterly direction on the Exit 52 ramp of Interstate 20 in Rankin County, Mississippi. At approximately the same time in place, Santos Rivera was operating a tractor trailer in an easterly direction in front of Travanti D. Williams' vehicle on the Exit 52 ramp of Interstate 20 in Rankin County, Mississippi. Suddenly and without warning, Santos Rivera put his vehicle in reverse and collided with Travanti D. Williams' vehicle. As a result of the collision, Travanti D. Williams sustained serious injuries.

6.

The collision and resulting damages to Travanti D. Williams were directly and proximately caused by the negligence of Santos Rivera and Flex Transport, Inc. in the following ways:

- (a) Failing to obey the traffic signs;
- (b) Failing to keep his vehicle under reasonable and proper control;
- (c) Failing to keep a reasonable and proper lookout as he operated his vehicle;
- (d) Failing to yield the right of way;
- (e) Failing to obey traffic signals;
- (f) Failing to abide by the Rules of the Road;
- (g) Operating his vehicle in a careless and negligent manner;
- (h) Failing to give adequate warnings of a collision;

- (i) Causing his vehicle to collide into the Plaintiff;
- (j) Speeding or travelling at a speed unreasonable for the existing conditions; and/or,
- (k) Other acts of omission and commission to be named in a trial of this matter.

7.

At all times relevant hereto, Santos Rivera was operating a vehicle owned and maintained by Flex Transport, Inc. and was acting in the course and scope of his employment with Flex Transport, Inc. As such, Flex Transport, Inc. is vicariously liable for any and all negligent acts of Santos Rivera under the theory of Respondeat Superior and/or vicarious liability as the employer of Santos Rivera or owner and maintainer of the vehicle Santos Rivera was operating at the time of the collision.

8.

Based on the foregoing, Plaintiff requests an award of damages for the following:

1. past, present, and future pain and suffering and resulting emotional distress and mental anguish;
2. past, present, and future loss of wages or wage earning capacity;
3. past medical expenses;
4. future medical expenses;
5. Pre-judgment interest;
6. Post-judgment interest; and,
7. All costs of court.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Travanti D. Williams, demands judgment against Defendants, Santos Rivera and Flex Transport, Inc., in an amount in excess of the jurisdictional minimum of this court and to be determined by a jury to adequately compensate

the plaintiff for his injuries; pre-judgment and post-judgment interest; his costs in pursuing this lawsuit; and any other relief to which he may be entitled under Mississippi Law.

RESPECTFULLY SUBMITTED, this the 8th day of June, 2022.

TRAVANTI D. WILLIAMS

BY: 
OF COUNSEL

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